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OU 2 NEPA Compliance Committee Recommendation Memorandum

J. M. Kersh, Associate General Manager Environmental Restoration & Waste Management EG&G Rocky Flats, Inc.

We have received your October 25, 1990, memorandum (90-RF-6475) concerning review of site preparation activities for the Operable Unit 2 (OU2) surface water Interim Measure/Interim Remedial Action Plan (IM/IRAP). Although we do not have any comments on the "bottom line" of starting preliminary site preparations, we do have some comments about the supporting information. These comments are as follows:

- (1) In the attached information there it is noted that the remediation at OU2 may be the subject of an Environmental Assessment (EA). This should be clarified that an EA is being done for the IM/IRAP.
- (2) It is also stated that the site preparation is for a <u>removal</u> action under CERCLA. This is incorrect. The action is a CERCLA (interim) <u>remedial</u> action and should not be confused with a CERCLA <u>removal</u> action.
- (3) The discussion under the NEPA Environmental Checklist Responses page, under item number 6, does not mention that waters are also being transported from the Woman Creek Drainage and should do so for accuracy.
- (4) The attached map showing the location of the proposed treatment trailers is too close to South Walnut Creek as probably within the 100 year floodplain. As discussed with the Environmental Restoration Staff, alternate locations need to be considered.

If you have any questions concerning this request, please contact me or have your staff contact Scott Grace of my staff at 7199.

David P. Simsonson, Acting Assistant Manager

for Environmental Management

cc:

E. Evered, EG&G/RF T. Greengard, EG&G/RF

L. Frick, EG&G/RF

K. Lewis, EG&G/RF

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